

UNITED STATES DISTRICT COURT

for the
District of Minnesota

____ Division

RECEIVED**OCT 11 2022**CLERK, U.S. DISTRICT COURT
ST. PAUL, MINNESOTAChristopher William Chamberlin,
Selene Eluna-Rey Draculea,
Family

Case No.

22-cv-2523 KMM/LIB

(to be filled in by the Clerk's Office)

*Plaintiff(s)**(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)*

-v-

Home Partners of America
William Young, Joe Florczak, Pathlight Property
Management.
All principals' partners and subsidiariesJury Trial: (check one) ☒ Yes ☐ No*Defendant(s)**(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)***COMPLAINT FOR A CIVIL CASE****I. The Parties to This Complaint****A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Christopher William Chamberlin, Selene E. Dracilea, Family
Street Address	10359 Canadians landing
City and County	Eden Prairie Hennepin
State and Zip Code	Minnesota 55347
Telephone Number	(320) 492-0102 (320) 339-5618
E-mail Address	chris56303@gmail.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

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Defendant No. 1

Name	William Young
Job or Title (if known)	CEO Home Partners of America/Pathlight Property Management
Street Address	120 S Riverside Plaza Suite 2000
City and County	Chacigo Cook
State and Zip Code	Illinois 60606
Telephone Number	(877) 234-5155
E-mail Address (if known)	

Defendant No. 2

Name	Joe Florczak
Job or Title (if known)	EVP Home Partners of America/Pathlight Property Management
Street Address	6500 International Pkwy STE 1100
City and County	Plano, Collin
State and Zip Code	TX 75093-8363
Telephone Number	(800) 527-5030
E-mail Address (if known)	

Defendant No. 3

Name	Pathlight Property Management
Job or Title (if known)	above matching address
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address (if known)	

Defendant No. 4

Name	Home Partners of America
Job or Title (if known)	above matching address
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address (if known)	

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)

☒ Federal question

☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

NOS code(s) 245, 360, 365 Many other issues at hand including Harassment and violations of Minnesota and Federal housing standards and statutes, and possible civil rights violations.

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, (name) Christopher W. Chamberlin, Selene e. Dracule, is a citizen of the State of (name) Minnesota.

b. If the plaintiff is a corporation

The plaintiff, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)**a. If the defendant is an individual**

The defendant, (name) William Young, Joe Florczak, is a citizen of the State of (name) unknown. Or is a citizen of (foreign nation) _____.

b. If the defendant is a corporation

The defendant, (name) Pathlight Property Mngt, Home partners, is incorporated under the laws of the State of (name) Tx, ll, and has its principal place of business in the State of (name) tx, ll.
 Or is incorporated under the laws of (foreign nation) _____,
 and has its principal place of business in (name) USA.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

\$4,500,000,000.00 Health and nature of claims

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

Less than safe living conditions resulting in family suffering with multiple health issues one none exclusive cause is a years exposure to bad guano and its toxins. Defence is joint as the are in control of the property to which we reside, They were informed multiple times of the many issues including by section 8 inspector. They furthermore ignored or disregarded the complaints placing my family directly in harmsway with repercussions.

In addition, after many months of negotiation and only after Minnesota Wildlife services explained to HPA the required steps to make the house safe again. (gutting the interior, cleaning within the walls and ceiling, and remodeling, they chose to move us to another property. new lease was signed for a Aug. 20 move in. new home failed inspection 2x and had to have minor work done to meet housing standards, move in began on sept 16 after finally passing. HPA Rep. [Kaisson Jones] stated that HPA would provide us with \$500 to assist us in moving. which still hasn't arrived. What did arrive is a notice to vacate from Burns/Hansen. (HPA representation) the new house by the 27 of sept. stating that we owed \$51748.50 in late rent fees and other charges. Said letter is in violation of 30 to 90 day notice to vacate under Minnesota landlord tenants laws and is false as to even possible amount to be behind. Letters will be attached. Address in question is 9650 Franlo Rd Eden Prairie, MN 55347. Due to Civil rights violations, Health and safety violations, MN statute violation regarding safe clean housing maintenance, Wreckless endangerment, Negligence w/w/o malicious intent. Both punitive and compensatory

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

\$4,500,000,000.00 damages unknown as ongoing health issues.

Question is the scope of living conditions and future quality of life. also seeking estoppel or cease and desist or injunction on actions against my family.

Defendant is already involved in Class action suits for semi related issues and violations RE: Hellmuth and Johnson case 1:22-cv-01138

V. Certification and Closing

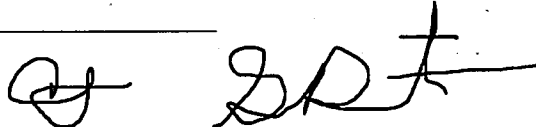
Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 09/23/22

Signature of Plaintiff



Printed Name of Plaintiff

Christopher William Chamberlin, Selene Eluna-Rey Draculea, Family

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address